09/09/1998

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 301 S. PARK, DRAWER 10096
HELENA, MONTANA 59626-0096

Ref: 8MO

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

September 9, 1998

Jon Nickel
Environmental Manager
Asarco, Inc.
P.O. Box 1230
East Helena, MT 59635

Dear Mr. Nickel:

The U.S. Environmental Protection Agency and the Montana Department of Environmental Quality have reviewed the draft February 1998 Plant Water Investigation report, dated July 1998. Our comments are below:

1. Provide isopleth maps of the water elevations for each sampling event and constituent concentrations for each sampling event. Maps of this nature were presented to us in overhead format during our last meeting. Therefore, we presume it should not be difficult to produce them and provide us with copies.

2. Due to the nature of existing (prior to plant water leaks) groundwater contamination at the site, the transient nature of existing groundwater contaminant concentrations, and the influence of the naturally occurring high groundwater in the fall 1997, it is very difficult to determine the precise timing or impacts of the plant water leaks. ASARCO should continue to monitor the effects of the plant water leaks, particularly near the fringe of the site. Effects on groundwater near the site boundary, if any, should become discernable over the next few monitoring events. The proposed supplemental monitoring in conjunction with the post-remedial investigation/feasibility study monitoring program should be sufficient for this purpose. At this time it is premature to make any conclusions about long-term impacts at the site.

3. The groundwater data gathered during the plant water investigation can likely provide valuable insight into contaminant fate and transport at the facility because the data provide a detailed picture of a site-specific, transient groundwater event. In addition, the groundwater data may be used to identify potential source areas at the site. For example, at monitoring well DH-28, where metals concentrations in groundwater prior to the leaks were well above those found in plant water, metals concentrations increased as the water table rose. These data should be used during the development of Resource Conservation and Recovery Act (RCRA) facility investigation (RFI) work plans.

Please submit the isopleth maps to both of us within 15 days of receipt of this letter. Should you have any questions please call either of us. Ms. Zazzali can be reached at (406)441-1130, ext. 226. Mr. Rise is at (406)444-2411.

Sincerely,

Susan Zazzali
Environmental Engineer
U.S. EPA Montana Office

For

David Rise
Environmental Enforcement Specialist
MT DEQ, Enforcement Division

cc: Bill Potts, DEQ-PCD
Adel Johnson, DEQ-PCD
Chuck Figur, 8ENF-L